

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DEOBARAH DONOGHUE and
AARON RUBENSTEIN

Plaintiffs,

v.

RETROPHIN, INC.,

Nominal Defendant,

- and -

MARTIN SHKRELI,

Defendant.

Case No. 14 Civ. 7640 (ER) (MHD)

ECF Case

**DECLARATION OF KATHLEEN A. REILLY
IN SUPPORT OF THE PROPOSED CONSENT ORDER
FOR SUBSTITUTION OF COUNSEL**

KATHLEEN A. REILLY, an attorney duly admitted to practice in the State of New York and before this Court, hereby declares under penalty of perjury as follows:

1. I am an associate at the law firm Arnold & Porter LLP, attorneys for Defendant Martin Shkreli ("Mr. Shkreli") in the above-captioned matter, a member in good standing of the bar of the State of New York, and admitted to practice in the U.S. District Court for the Southern District of New York. I currently serve with Elissa J. Preheim (*pro hac vice*) and Rebecca L. Gordon (*pro hac vice*) as counsel of record in this case. I respectfully submit this declaration in support of the Proposed Consent Order for Substitution of Counsel.

2. Pursuant to Local Civil Rule 1.4 of the U.S. District Court for the Southern District of New York, Mr. Shkreli and Arnold & Porter LLP have agreed that Mr. Shkreli's best interests are served by retaining new counsel.

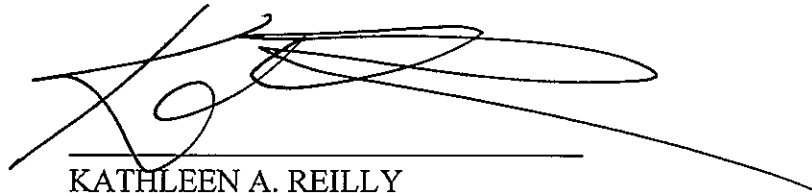
3. With Mr. Shkreli's consent, Fox Rothschild LLP has been retained as substitute counsel. Arnold & Porter will withdraw as counsel of record.

4. As of the making of this Declaration, the parties had previously agreed to a settlement of all claims asserted in this matter against Defendants, and, on October 19, 2015, Plaintiffs filed a formal Stipulation of Settlement ("Stipulation") and moved approval. On December 2, 2015, the Court entered an Order and Final Judgment in the action, approving the Stipulation, reserving jurisdiction over all matters relating to enforcement, administration and performance of the Stipulation, and directing the Clerk of the Court to close the case.

5. Arnold & Porter LLP is not asserting a retaining or charging lien in this case.

6. In view of the foregoing, it is respectfully requested that, pursuant to Local Civil Rule 1.4, Fox Rothschild LLP be substituted as counsel of record in place of Arnold & Porter LLP.

Date: February 11, 2016



KATHLEEN A. REILLY